

October 21, 2024

VIA ECF

Hon. Vernon S. Broderick
 U.S. District Judge
 Thurgood Marshall
 United States Courthouse
 40 Foley Square
 New York, NY 10007

**Re: *Brown v. Frankie Shop LLC et al*, Civ. No. 24-cv-05688-VSB
 Letter Motion on Consent Requesting Extensions of Time to Respond to Plaintiff's
 Complaint and Defendant Flemington Estates LLC's Crossclaim**

Dear Judge Broderick:

As you are aware, we represent Defendant Frankie Shop LLC ("Frankie Shop") in the above-referenced action. Frankie Shop respectfully moves the Court to reset the following deadlines as set forth in the below chart:

EVENT	CURRENT DEADLINE	REQUESTED EXTENSION
Frankie Shop's deadline to answer, move, or otherwise respond to Plaintiff's Complaint	October 25, 2024	November 25, 2024
Frankie Shop's deadline to answer, move, or otherwise respond to Defendant Flemington Estates LLC's Crossclaim	November 4, 2024	December 4, 2024

Both Plaintiff's counsel and Defendant Flemington Estates LLC's counsel consent to these respective requests for 30-day extensions of time.

Frankie Shop previously requested an extension of time to answer, move, or otherwise respond to Plaintiff's Complaint (Dkt. 12), which the Court granted on August 15, 2024. (Dkt. 13.) Frankie Shop has not previously sought to extend its deadline to answer, move, or otherwise respond to Defendant Flemington Estates LLC's Crossclaim. Frankie Shop seeks these extensions to permit the parties to continue meaningful discussions regarding Plaintiff's allegations.

We thank the Court for its time and courtesies.

Respectfully submitted,

/s/ Mary Kate Brennan

Mary Kate Brennan
Senior Attorney

cc: All counsel of record (via ECF)